

Remarks

Claims 1, 2, and 4-22 are now pending in this application. Applicant has amended claims 1, 2, 4-7, and 12, canceled claim 3 and added new claims 21 and 22 to clarify the present invention. Applicant respectfully requests favorable reconsideration of this application.

Applicant has amended the abstract to delete legal terminology. Applicant attaches hereto on a separate sheet a clean copy of the abstract.

Applicant has amended the first paragraph on page 3 of the specification to correct a typographical error.

Applicant has amended claims 6 and 12 to eliminate the term "it". Accordingly, Applicant respectfully request withdrawal of the objection to claims 6 and 12.

The Examiner rejected claim 4 under 35 U.S.C. § 112, second paragraph as indefinite. Applicant has amended claim 4 to delete the "such as" and has added new claims 21 and 22 to recite subject matter deleted from claim 4. Applicant submits that all pending claims comply with 35 U.S.C. § 112, second paragraph and respectfully request withdrawal of this rejection.

The Examiner rejected claims 1-3 and 15-18 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 4,438,817 to Pokladnik et al. The Examiner rejected claims 5-12 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 4,174,011 to Zaremba. The

Examiner rejected claims 5, 7, and 13 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,992,526 to Cunningham et al. The Examiner rejected claims 1 and 19 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,085,277 to Hopper. The Examiner rejected claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Pokladnik et al. in view of U.S. patent 6,231,265 to Rytlewski et al. The Examiner rejected claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Cunningham et al. in view of U.S. patent 6,325,159 to Peterman et al. The Examiner rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Hopper in view of Pokladnik et al.

Pokladnik et al. does not disclose the present invention as recited in claim 1 since, among other things, Pokladnik et al. does not disclose a structure that includes a guide member that includes a plurality of projections. Pokladnik et al. also does not disclose that a plurality of the projections are engaged by a single guide member. Rather, Pokladnik et al. appears to disclose a structure that includes guide posts, each of which is engaged by a guide post on a Christmas tree assembly or a manifold-separator assembly. Therefore, Pokladnik et al. does not disclose the present invention as recited in claim 1 or claims 2 and 15-18, which depend from claim 1.

Zaremba does not disclose the present invention as recited in claim 5 since, among other things, Zaremba does not disclose a structure that includes at least one guide member that includes an array of recesses operative to engage corresponding generally vertically extending projections. Zaremba also does not disclose that a plurality of the projections are engaged by one guide member. Rather, Zaremba appears to disclose a structure that includes a post/pin 80 that includes laterally extending teeth 90 that engage laterally teeth 92 on carousel guidance slot

40. Therefore, Zaremba does not disclose the present invention as recited in claim 5 or claims 6-12, which depend therefrom.

Cunningham et al. does not disclose the present invention as recited in claim 5 since, among other things, Cunningham et al. does not disclose a structure that includes at least one guide member that includes an array of recesses operative to engage corresponding generally vertically extending projections. Cunningham et al. also does not disclose that a plurality of the projections are engaged by each guide member. Rather, Cunningham et al. appears to disclose a slot 26 in which a body 30 is arranged. The slot does not include a plurality of recesses and does not receive a plurality of projections. Therefore, Cunningham et al. does not disclose the present invention as recited in claim 5 or claims 7 and 13, which depend therefrom.

Hopper does not disclose the present invention as recited in claim 1 since, among other things, Hopper does not disclose a structure that includes a guide member that includes a plurality of projections. Hopper also does not disclose that a plurality of the projections are engaged by a single guide member. Rather, Hopper appears to disclose a structure that includes stack 17, which the Examiner has identified as a guide member, and guide sleeves 27 and 28, which the Examiner identifies as projections and recesses, respectively. Therefore, Hopper does not disclose the present invention as recited in claim 1 or claim 19, which depend from claim 1.

In view of the above, none of Pokladnik et al., Zaremba, Cunningham et al., or Hopper discloses all elements of the present invention as recited in newly amended claims 1 and 5 and claims dependent thereon. Since none of Pokladnik et al., Zaremba, Cunningham et al., or

Hopper discloses all elements of the present invention as recited in newly amended claims 1 and 5 and claims dependent thereon, the present invention, as recited in claims 1, 2, and 5-19, is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

Pokladnik et al. does not suggest the present invention as recited in claim 4 since, among other things, Pokladnik et al. does not suggest a structure that includes a guide member that includes a plurality of projections. Pokladnik et al. also does not suggest that a plurality of the projections are engaged by a single guide member. Rather, Pokladnik et al. appears to suggest a structure that includes guide posts, each of which is engaged by a guide post on a Christmas tree assembly or a manifold-separator assembly. Combining Pokladnik et al. with Rytlewski et al. does not suggest the present invention since, among other things, even if the structure suggested by Pokladnik et al. were provided with an outer layer of a low-friction material as the Examiner asserts Rytlewski et al. suggests, Pokladnik et al. would not suggest the above-discussed features of the present invention as recited in claim 4. Therefore, the combination of Pokladnik et al. and Rytlewski et al. does not suggest the present invention as recited in claim 4.

Cunningham et al. does not suggest the present invention as recited in claim 14 since, among other things, Cunningham et al. does not suggest a structure that includes at least one guide member that includes an array of recesses operative to engage corresponding generally vertically extending projections. Cunningham et al. also does not suggest that a plurality of the projections are engaged by each guide member. Rather, Cunningham et al. appears to suggest a slot 26 in which a body 30 is arranged. The slot does not include a plurality of recesses and does not receive a plurality of projections. Combining the structure suggested by Cunningham et al. with the structure suggested by Peterman et al. does not suggest the present invention as recited in claim 14 since, the mud pump that the Examiner asserts Peterman et al. suggests would not provide the present invention with the recesses and projections as described above. Therefore, the combination of Cunningham et al. and Peterman et al. does not suggest the present invention as recited in claim 14.

Hopper does not suggest the present invention as recited in claim 20 since, among other things, Hopper does not suggest a structure that includes a guide member that includes a plurality of projections. Hopper also does not suggest that a plurality of the projections are engaged by a single guide member. Rather, Hopper appears to suggest a structure that includes stack 17, which the Examiner has identified as a guide member, and guide sleeves 27 and 28, which the Examiner identifies as projections and recesses, respectively. Combining the structure suggested by Hopper with the structure suggested by Pokladnik et al. would not suggest the present invention as recited in claim 20 since, among other things, Pokladnik et al. does not overcome the above-described deficiencies of Hopper. Therefore, the combination of Hopper and

Pokladnik et al. does not suggest the present invention as recited in claim 20.

In view of the above, the references relied upon in the office action, whether considered alone or in combination, do not disclose or suggest patentable features of the present invention. Therefore, the references relied upon in the office action, whether considered alone or in combination, do not anticipate the present invention or make the present invention obvious. Accordingly, Applicant submits that the present invention is patentable over the cited references.

If an interview would advance the prosecution of this application, Applicant respectfully urges the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge insufficient fees and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date:

1/23/06



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